

1 Hon. Robert S. Lasnik  
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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JOB'S DAUGHTERS INTERNATIONAL,

Plaintiff,

v.

HEIDI YOAST,

Defendant; *and*

HEIDI YOAST,

Counterclaim Plaintiff,

v.

JOB'S DAUGHTERS INTERNATIONAL,  
SHELLY COLE aka SHELLY HOWRIGON, an  
individual, ROD REID, an individual

Counterclaim Defendant

NO. 16-CV-01573-RSL

**MOTION FOR LEAVE TO  
SUBSTITUTE COUNSEL**

Pursuant to the Western District of Washington LCR 83.2(b)(1), Heidi Yoast

("Defendant") respectfully moves for leave to substitute counsel.

MOTION FOR LEAVE TO SUBSTITUTE COUNSEL - 1

**GARVEY SCHUBERT BARER**  
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS  
eighth floor  
1191 second avenue  
seattle, washington 98101-2939  
206 464 3939

Defendant is currently represented by:

John B Crosetto  
GARVEY SCHUBERT BARER  
1191 SECOND AVE  
18TH FL  
SEATTLE, WA 98101-2939  
206-464-3939  
Fax: 206-464-0125  
Email: [jcrosetto@gsblaw.com](mailto:jcrosetto@gsblaw.com)

Defendant respectfully requests the Court's leave for the withdrawal of John B. Crosetto and the firm of Garvey Schubert Barer, and the substitution Groves Law Offices, LLP, specifically:

Tracey V. Munger  
GROVES LAW OFFICES, LLP  
THE OLD TACOMA ARMORY  
1001 S YAKIMA AVE #1  
Tacoma, WA 98405  
Phone: (253) 220-3511  
Fax: (253) 220-5557  
[tracey@groveslawoffices.com](mailto:tracey@groveslawoffices.com)  
LEAD ATTORNEY  
ATTORNEY TO BE NOTICED

Patricia I. Forman, admitted *pro hac vice*, will continue as counsel with GROVES LAW OFFICES, LLP, who agrees to sign all filings and to be prepared to handle the matter, including the trial thereof, in the event the attorney admitted *pro hac vice* is unable to be present on any date scheduled by the court, pursuant to LCR 83.1(d).

This Motion should be granted because the substitution of counsel will not prejudice Plaintiff. The Court granted Defendant leave to file an Amended Answer and Counterclaims, which was filed June 29, 2017. Discovery may proceed as scheduled. This Motion and the proposed order submitted herewith, were served upon the client and opposing counsel.

1 DATED this 7th day of September, 2017.

2 GARVEY SCHUBERT BARER

3 By /s/ John B. Crosetto  
4 John B. Crosetto, WSBA #36667

5 GARVEY SCHUBERT BARER  
6 1191 Second Avenue  
7 Suite 1800  
8 Seattle, WA 98101-3438  
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9 Attorneys for Defendant

10 Heidi Yoast

11 By /s/ Patricia I. Forman

12 Patricia I. Forman, Esq. California Bar No. 245108,  
13 *pro hac vice* for Counter- Complainant / Defendant  
Heidi Yoast

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Telephone: 213-2708403  
16 Email: [patriciaforman@gmail.com](mailto:patriciaforman@gmail.com)

17 Approved as to form;

18 By /s/ Tracey V. Munger  
Tracey V. Munger, WSBA #33854

19 GROVES LAW OFFICES, LLP  
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[tracey@groveslawoffices.com](mailto:tracey@groveslawoffices.com)  
23 LEAD ATTORNEY  
24 ATTORNEY TO BE NOTICED

## **CERTIFICATE OF SERVICE**

The undersigned declares and states as follows:

I am a citizen of the United States, over the age of 18 years, not a party to the above-referenced matter, and am competent to be a witness.

On September 7, 2017, I electronically filed the following document(s):

## MOTION FOR LEAVE TO SUBSTITUTE COUNSEL

with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all associated counsel of record.

I also served said documents in the manner set forth below on the following parties:

Rodney L. Umberger, WSBA #24948  
Daniel J. Velloth, WSBA #44379  
WILLIAMS, KASTNER & GIBBS, PLLC  
601 Union Street, Suite 4100  
Seattle, WA 98101-2380  
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[rumberger@williamskastner.com](mailto:rumberger@williamskastner.com)  
[dvelloth@williamskastner.com](mailto:dvelloth@williamskastner.com)  
*Attorneys for Plaintiff*

- Via U.S. Mail*
- Via Facsimile Transmission*
- Via Email by USDC Western District EM/ECF Filing System*
- Via Hand-Delivery*

Brian T. McKernan, NE #22174  
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- Via U.S. Mail*
- Via Facsimile Transmission*
- Via Email by USDC Western District EM/ECF Filing System*
- Via Hand-Delivery*

*Attorneys for Plaintiff Job's Daughters International*

Heidi Yoast  
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- Via U.S. Mail*
- Via Facsimile Transmission*
- Via Email by USDC Western District EM/ECF Filing System*
- Via Hand-Delivery*

### ***Defendant and Counterclaim Plaintiff***

1 I declare under penalty of perjury according to the laws of the State of Washington that  
2 the above statements are true and correct.

3 SIGNED at Seattle, Washington this 6th day of July, 2017.

4 */s/ Patricia Forman*  
5 Printed name: Patricia Forman

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